

BEFORE THE ARIZONA CORPORATION COMMISSION

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2 3 4 5 6	COMMISSIONERS LEA MÁRQUEZ PETERSON - Chairwoman SANDRA D. KENNEDY JUSTIN OLSON ANNA TOVAR JIM O'CONNOR	Arizona Corporation Commission DOCKETED JUN 2 4 2021 DOCKETED BY
7	In the matter of))DOCKET NO. S-21101A-20-0068
8	OWNZONES MEDIA NETWORK, INC., a	
9		DECISION NO
0	DANIEL GOMAN, and ALINA GOMAN, husband and wife,))
1 2 3 4		ORDER TO CEASE AND DESIST, ORDER FOR RESTITUTION, ORDER FOR ADMINISTRATIVE PENALTIES, AND ORDER FOR OTHER AFFIRMATIVE ACTION AND CONSENT TO SAME BY: RESPONDENTS OWNZONES MEDIA NETWORK, INC., DANIEL GOMAN, AND ALINA GOMAN
5 6 7 8	(**)	work, Inc., Daniel Goman, and Alina Goman elec appeal under Articles 11 and 12 of the Securities

Respondents OWNZONES Media Network, Inc., Daniel Goman, and Alina Goman elect to permanently waive any right to a hearing and appeal under Articles 11 and 12 of the Securities Act of Arizona, A.R.S. § 44-1801 *et seq.* ("Securities Act") with respect to this Order to Cease And Desist, Order for Restitution, Order for Administrative Penalties, and Order for Other Affirmative Action. OWNZONES Media Network, Inc., Daniel Goman, and Alina Goman admit the jurisdiction of the Arizona Corporation Commission ("Commission"); neither admit nor deny the Findings of Fact and Conclusions of Law contained in this Order; and consent to the entry of this Order by the Commission.

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I.

FINDINGS OF FACT

- 1. OWNZONES Media Network, Inc. ("OWNZONES") is a corporation organized under the laws of the state of Nevada on October 1, 2013. OWNZONES is the surviving company of a merger on October 1, 2013, between OWNZONES and an older corporation also named OWNZONES Media Network, Inc. The older OWNZONES Media Network, Inc. was a corporation organized under the laws of the state of Washington on January 13, 2010, under the name MiiCast Network, Inc. References below to OWNZONES prior to October 1, 2013, refer to the predecessor Washington corporation. OWNZONES has not been registered by the Commission as a securities salesman or dealer, and none of OWNZONES' securities have been registered by the Commission.
- 2. Since at least January 13, 2010, Daniel Goman ("Goman") has been a married man. Goman maintained a residence in Arizona from at least as early as November 1, 2013, to at least February 6, 2020. Goman has been the President, the Chief Executive Officer, and a director of OWNZONES since it was founded in 2010. Goman has not been registered by the Commission as a securities salesman or dealer.
- 3. Since at least January 13, 2010, Alina Goman ("Respondent Spouse") has been the spouse of Goman. Respondent Spouse is joined in this action under A.R.S. § 44-2031(C).
- 4. At all relevant times, Goman was acting for his own benefit and on behalf of and for the benefit of the marital community.
 - 5. OWNZONES and Goman may be referred to collectively as "Respondents."
- 6. OWNZONES was previously a subscription-based streaming audiovisual content company, but eventually pivoted to become a digital media supply chain company. OWNZONES' principal place of business was in Washington state until at least as early as approximately November 1, 2013, when OWNZONES moved its principal place of business to Arizona. OWNZONES later moved its principal place of business to California on or about August 1, 2017.

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- 7. In 2011 OWNZONES began its "Series A" securities offering selling OWNZONES stock ("the Offering"), which continued through at least June 29, 2018. OWNZONES sold its stock to both Arizona and non-Arizona investors both before and after moving its principal place of business to Arizona. The first OWNZONES stock sale to an Arizona investor was made on or about June 27, 2013.
- 8. Because Goman is of Romanian descent, OWNZONES' securities sales were concentrated among Romanian immigrants and residents of Romania and investor communications included communication materials in Romanian. Goman has estimated that approximately 60% of OWNZONES investors are Romanian and that they invested roughly 80% of the funds OWNZONES raised.
- Goman signed most or all subscription documents and all stock certificates for the OWNZONES Offering.
- 10. In approximately June 2016, an OWNZONES agent presented an OWNZONES investment pitch to potential investors at OWNZONES' office in Arizona. The presentation included a video, a slide presentation, and promotional materials.
- 11. OWNZONES' Offering was made in reliance on a particular exemption from securities regulation, namely, federal Rule 506(b) of Regulation D. This exemption has a strict limit on the number of investors who can participate in the offering without qualifying as accredited investors, specifically a limit of 35 non-accredited investors.

Falsifying Accredited Investor Qualifications

- 12. Throughout the Offering, OWNZONES used substantially similar standardized subscription agreements that included a section requiring investors to state their accredited investor qualifications, if any, by marking a line on the subscription agreement.
- 13. Some OWNZONES investors submitted subscription agreements indicating that they were not accredited investors. On at least three occasions, OWNZONES falsified those investors' subscription agreements to indicate that the investors were accredited investors based on income.

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Pre-Marking Accredited Investor Qualifications

- 14. OWNZONES sent subscription agreements that were pre-marked to indicate accredited investor status based on income ("Pre-Marked Accredited Agreements"), including to some investors for whom OWNZONES did not have specific knowledge of their income.
- 15. In some instances, OWNZONES instructed the investor to "only" fill out the name, identifying information, investment amount, and signature block sections of the subscription agreement. OWNZONES thus implicitly instructed those investors not to fill out the accredited investor qualification section of the Pre-Marked Accredited Agreements.
- 16. Some investors who were not accredited investors overlooked the pre-marked accredited investor qualification section, and those investors thus unwittingly and incorrectly represented that they were accredited investors.

Sub-Investors

- 17. The number of non-accredited investors was obscured by persons referred to as "sub-investors," who were investors who invested under the name of an existing OWNZONES investor, whom OWNZONES referred to as "account holders." OWNZONES was aware of this sub-investor practice at least as early as February 23, 2016, and knew that the sub-investors included non-accredited investors.
- 18. OWNZONES was aware of investments by sub-investors while continuing to indicate in its subscription agreements that investors could only invest for their own account. OWNZONES required investors to represent in their subscription agreements that the investor was "acquiring the [OWNZONES] Shares solely for the [investor's] own account ... and has no agreement, understanding or intention to distribute, sell, transfer or pledge any of the Shares" In fact, OWNZONES was aware at least as early as February 23, 2016, that account holders and sub-investors were using a form agreement by which the account holder agreed to hold the sub-investor's OWNZONES shares and transfer them once OWNZONES shares became publicly traded.

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- 19. OWNZONES was also aware of allegations at least as early as August 6, 2016, that in some cases account holders defrauded potential sub-investors by taking money from sub-investors for the purpose of an OWNZONES sub-investment and instead keeping the money themselves.
- 20. OWNZONES did not keep track of which investments by account holders were actually made on the account holders' own behalf, so any Offering investment may have been funded by a sub-investor unknown to OWNZONES. One OWNZONES investor had sub-investors who made at least 73 sub-investments totaling over \$1.7 million, and OWNZONES did not know who those sub-investors were.

Omitting Investment Risks

21. OWNZONES prepared a risk disclosure document for its Offering. However, OWNZONES and Goman did not provide the risk disclosure document to some investors. OWNZONES and Goman also did not provide any oral risk disclosures to at least four of these investors. OWNZONES thus omitted to tell some investors any of the risks of the Offering.

Omitting Goman's Bankruptcy

- 22. On August 21, 2010, Goman and Respondent Spouse filed for protection under the U.S. Bankruptcy Code, Chapter 13. They filed this petition seven months after OWNZONES was founded in January 2010. Goman and Respondent Spouse were not granted a bankruptcy discharge until October 8, 2015. By the time of the discharge, OWNZONES had raised approximately \$12.8 million from its Offering.
- The OWNZONES document that outlined the Offering described Goman's business background but omitted the Gomans' bankruptcy.

II.

CONCLUSIONS OF LAW

 The Commission has jurisdiction over this matter pursuant to Article XV of the Arizona Constitution and the Securities Act.

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- Respondents offered or sold securities within or from Arizona, within the meaning of A.R.S. §§ 44-1801(16), 44-1801(22), and 44-1801(27).
- 3. Respondents violated A.R.S. § 44-1841 by offering or selling securities that were neither registered nor exempt from registration.
- 4. Respondents violated A.R.S. § 44-1842 by offering or selling securities while neither registered as a dealer or salesman nor exempt from registration.
- 5. Respondents violated A.R.S. § 44-1991 by (a) employing a device, scheme, or artifice to defraud, (b) making untrue statements or misleading omissions of material facts, and/or (c) engaging in transactions, practices, or courses of business that operate or would operate as a fraud or deceit.
- 6. Respondents' conduct is grounds for a cease and desist order pursuant to A.R.S. § 44-2032.
- 7. Respondents' conduct is grounds for an order of restitution pursuant to A.R.S. § 44-2032.
- 8. Respondents' conduct is grounds for an order to take other affirmative action pursuant to A.R.S. § 44-2032.
 - 9. Respondents' conduct is grounds for administrative penalties under A.R.S. § 44-2036.
- 10. Respondent Goman acted for his own benefit and on behalf of and for the benefit of the marital community and, this order of restitution is a debt of the community.
- 11. Respondent Goman directly or indirectly controlled Respondent OWNZONES Media Network, Inc. within the meaning of A.R.S. § 44-1999. Therefore, Respondent Goman is jointly and severally liable under A.R.S. § 44-1999 to the same extent as Respondent OWNZONES Media Network, Inc. for its violations of A.R.S. § 44-1991.

III.

ORDER

THEREFORE, on the basis of the Findings of Fact, Conclusions of Law, and Respondents consent to the entry of this Order, attached and incorporated by reference, the Commission finds that the following relief is appropriate, in the public interest, and necessary for the protection of investors:

IT IS ORDERED, pursuant to A.R.S. § 44-2032, that Respondents, and any of Respondents' agents, employees, successors and assigns, permanently cease and desist from violating the Securities Act.

IT IS FURTHER ORDERED that Respondents comply with the attached Consent to Entry of Order.

IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2032, that Respondent OWNZONES shall engage, at its own expense, up to an additional \$100,000 beyond the engagement fee contemplated for distributions in connection with case number 2:20-cv-03108 in the United States District Court for the Central District of California, a distribution agent to serve at the Commission's direction for the purpose of all distributions made pursuant to this Order ("Distribution Agent"). If reasonably possible, Respondents shall engage the distribution agent selected by the Securities and Exchange Commission to distribute funds collected in connection with Case number 2:20-cv-03108 in the United States District Court for the Central District of California. The Director of Securities may instead approve Respondents to engage an alternate Distribution Agent.

The Commission may disperse restitution funds through the Distribution Agent. The Commission may rely on information developed by the Distribution Agent to supplement the records of the Commission as to the identity of the beneficial-owner investors.

IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2032, that Respondent OWNZONES and Respondent Goman, as his sole and separate obligation, and Respondent Goman and Respondent Spouse, as a community obligation, shall jointly and severally pay restitution to the Commission in the principal amount of \$4,500,000 as a result of the conduct set forth in the Findings of Fact and

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Conclusions of Law. Payment of the restitution shall be due as follows: \$3,000,000 due seven days after the date of this Order, \$500,000 due 100 days after the date of this Order, \$500,000 due 200 days after the date of this Order, and \$500,000 due 300 days after the date of this Order. Payment shall be made to the Distribution Agent to be placed in an interest-bearing account.

If the Respondents have not engaged a Distribution Agent at the time that any of the Respondents make a restitution payment pursuant to this Order, then the payment shall be made to the Commission. Any payment to the Commission shall be made to the "State of Arizona" to be placed in an interest-bearing account controlled by the Commission. Once a Distribution Agent has been engaged pursuant to this Order, the Commission may transfer any payment made to the Commission pursuant to this Order, with any accrued interest, to the Distribution Agent.

IT IS FURTHER ORDERED that the restitution ordered in the preceding paragraph will accrue interest, as of the date payment is due, at the rate of the lesser of (i) ten percent per annum or (ii) at a rate per annum that is equal to one per cent plus the prime rate as published by the board of governors of the federal reserve system in statistical release H.15 or any publication that may supersede it on the date that the judgment is entered.

The Commission shall disburse the funds on a pro-rata basis to beneficial owner-investors shown on the records of the Commission. Any restitution funds that the Commission cannot disburse because an investor refuses to accept such payment, or any restitution funds that cannot be disbursed to an investor because the investor is deceased shall be disbursed on a pro-rata basis to the remaining investors shown on the records of the Commission. Any funds that the Commission determines it is unable to or cannot feasibly disburse shall be transferred to the general fund of the state of Arizona. For purposes of this Order, "beneficial owner-investors" means investors shown on the records of the Commission to have been Arizona residents at the time of their investment, to have invested under the name of a person who was an Arizona resident at the time of the investment, or to have invested on or after November 1, 2013 and on or before August 1, 2017, and who invested in their own name, to the extent they made investments in OWNZONES for their own benefit, or invested

as so-called "sub-investors" who invested for their own benefit but under the name of an existing OWNZONES investor. Any restitution or other payments made by Respondents in connection with Case number 2:20-cv-03108 in the United States District Court for the Central District of California shall not be credited as offsets to their restitution obligations from this Order.

IT IS FURTHER ORDERED, that it would be appropriate to order Respondent OWNZONES and Respondent Goman to pay administrative penalties pursuant to A.R.S. § 44-2036. However, the Commission declines to assess such penalties so that those funds may instead be applied to restitution for investors.

IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2032, that OWNZONES shall not contest an individual demand made by select beneficial owner-investors pursuant to A.R.S. §§ 44-2001(A) and 44-1841 to void any or all of their purchases of OWNZONES shares in exchange for the Purchase Price of the chosen shares (a "Demand"), subject to Respondents confirming the beneficial owner-investor's purchase(s). All beneficial owner-investors who are shown on the records of the Commission to have been Arizona residents at the time of their investment and all other beneficial owner-investors who are shown on the records of the Commission to have invested on or after November 1, 2013, and on or before August 1, 2017, are eligible to make a Demand. The Commission may rely on information developed by the Distribution Agent to supplement the records of the Commission as to the identity of the relevant beneficial-owner investors eligible for the Demand. Eligible beneficial owner-investors who wish to make a Demand must do so within 365 days of the date of this Order by submitting a claim form to OWNZONES.

Within 30 days of the date of this Order, OWNZONES shall communicate how to make a Demand to all investors and beneficial owner-investors identified by the Director of Securities using materials approved for communication by the Director of Securities. Within 30 days of the date of this Order, OWNZONES shall prepare a claim form approved by the Director of Securities that relevant persons may submit to OWNZONES to make a Demand. In the event that a beneficial owner-investor makes a Demand to cancel the purchase of shares purchased for his or her own benefit

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25 26 but under the name of an existing OWNZONES investor, upon confirmation of the purchase(s), OWNZONES will void the purchase transaction(s), pay the Purchase Price to the beneficial ownerinvestor who made the Demand, and notify the investor in whose name the shares were held of the cancellation. OWNZONES will request that the investor in whose name the shares were held return his or her stock certificates to OWNZONES. OWNZONES will issue a new certificate reflecting the revised number of shares held in the name of the investor.

For purposes of this Order, "Purchase Price" means the amount paid for the purchase of OWNZONES shares, plus 4.25% interest per annum calculated from the date of purchase to the date of this Order, minus the amount of restitution paid or due to be paid pursuant to this Order for the shares and minus the amount of any distribution paid or due to be paid in connection with Case number 2:20-cv-03108 in the United States District Court for the Central District of California for the shares. Respondent OWNZONES shall satisfy all valid Demands within 60 days after the 365day window for making a Demand has closed, and Respondent OWNZONES shall notify the Director of Securities of all Demand payments when they are made. Respondent OWNZONES shall notify the Director of Securities of all Demands that OWNZONES believes are invalid or not eligible for payment.

IT IS FURTHER ORDERED, that for purposes of this Order, a bankruptcy filing by either Respondent shall be an act of default by that Respondent. If Respondents do not comply with this Order, any outstanding balance may be deemed in default and shall be immediately due and payable.

IT IS FURTHER ORDERED, that if Respondents fail to comply with this Order, the Commission may bring further legal proceedings against Respondents, including application to the superior court for an order of contempt.

IT IS FURTHER ORDERED, that no finding of fact or conclusion of law contained in this Order shall be deemed binding against any Respondent under this Docket Number who has not consented to the entry of this Order.

IT IS FURTHER ORDERED that this Order shall become effective immediately. BY ORDER OF THE ARIZONA CORPORATION COMMISSION

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CONSENT TO ENTRY OF ORDER

- 1. Respondents and Respondent Spouse admit the jurisdiction of the Commission over the subject matter of this proceeding. Respondents and Respondent Spouse acknowledge that Respondents have been fully advised of Respondents' right to a hearing to present evidence and call witnesses and Respondents and Respondent Spouse knowingly and voluntarily waive any and all rights to a hearing before the Commission and all other rights otherwise available under Article 11 of the Securities Act and Title 14 of the Arizona Administrative Code. Respondents and Respondent Spouse acknowledge that this Order to Cease and Desist, Order for Restitution, Order for Administrative Penalties, and Order for Other Affirmative Action ("Order") constitutes a valid final order of the Commission.
- 2. Respondents and Respondent Spouse knowingly and voluntarily waive any right under Article 12 of the Securities Act to judicial review by any court by way of suit, appeal, or extraordinary relief resulting from the entry of this Order.
- 3. Respondents and Respondent Spouse acknowledge and agree that this Order is entered into freely and voluntarily and that no promise was made or coercion used to induce such entry.
- 4. Respondents and Respondent Spouse have been represented by an attorney in this matter, Respondents and Respondent Spouse have reviewed this order with their attorneys, Margaret Carter of O'Melveny & Myers LLP and Brian Schulman of Weiss Brown, and understand all terms it contains. Respondents and Respondent Spouse acknowledge that their attorneys have apprised them of their rights regarding any conflicts of interest arising from multiple representation. Respondents and Respondent Spouse acknowledge that they have each given their informed consent to such representation.
- 5. Respondents and Respondent Spouse neither admit nor deny the Findings of Fact and Conclusions of Law contained in this Order.
- 6. Respondents and Respondent Spouse agree that they shall not contest the validity of the Findings of Fact and Conclusions of Law contained in this Order in any present or future

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proceeding in which the Commission is a party. This paragraph does not apply to any administrative, civil, or regulatory proceedings in which the Commission is not a party.

- 7. Respondents and Respondent Spouse further agree that they shall not deny or contest the Findings of Fact and Conclusions of Law contained in this Order in any present or future: (a) bankruptcy proceeding, or (b) non-criminal proceeding in which the Commission is a party (collectively, "proceeding(s)"). They further agree that in any such proceedings, the Findings of Fact and Conclusions of Law contained in this Order may be taken as true and correct and that this Order shall collaterally estop them from re-litigating with the Commission or any other state agency, in any forum, the accuracy of the Findings of Fact and Conclusions of Law contained in this Order. In the event a Respondent or Respondent Spouse pursues bankruptcy protection in the future, Respondents and Respondent Spouse further agree that in such bankruptcy proceeding, pursuant to 11 U.S.C. § 523(a)(19), the following circumstances exist:
- A. The obligations incurred as a result of this Order are a result of the conduct set forth in the Findings of Fact and Conclusions of Law in the Order and are for the violation of Arizona state securities laws, pursuant to 11 U.S.C. § 523(a)(19)(A)(i);
- B. This Order constitutes a judgment, order, consent order, or decree entered in a state proceeding pursuant to 11 U.S.C. § 523(a)(19)(B)(i), a settlement agreement entered into by Respondents and Respondent Spouse pursuant to 11 U.S.C. § 523(a)(19)(B)(ii), and a court order for damages, fine, penalty, citation, restitution payment, disgorgement payment, attorney fee, cost or other payment owed by Respondents and Respondent Spouse pursuant to 11 U.S.C. § 523(a)(19)(B)(iii).
- 8. By consenting to the entry of this Order, Respondents and Respondent Spouse agree not to take any action or to make, or permit to be made, any public statement denying, directly or indirectly, any Finding of Fact or Conclusion of Law in this Order or creating the impression that this Order is without factual basis. This paragraph does not apply to any administrative, civil, or regulatory proceeding in which the Commission is not a party.

- 9. While this Order settles this administrative matter between Respondents and the Commission, Respondents and Respondent Spouse understand that this Order does not preclude the Commission from instituting other administrative or civil proceedings based on violations that are not addressed by this Order.
- 10. Respondents and Respondent Spouse understand that this Order does not preclude the Commission from referring this matter to any governmental agency for administrative, civil, or criminal proceedings that may be related to the matters addressed by this Order.
- 11. Respondents and Respondent Spouse understand that this Order does not preclude any other agency or officer of the state of Arizona or its subdivisions from instituting administrative, civil, or criminal proceedings that may be related to matters addressed by this Order.
- Respondent Goman and Respondent Spouse acknowledge that any restitution imposed by this Order is a community obligation.
- 13. Respondents and Respondent Spouse consent to the entry of this Order and agree to be fully bound by its terms and conditions.
- 14. Respondents and Respondent Spouse acknowledge and understand that if Respondents fail to comply with the provisions of the Order and this consent, the Commission may bring further legal proceedings against them, including application to the superior court for an order of contempt.
- 15. Respondents and Respondent Spouse understand that default shall render them liable to the Commission for its costs of collection, including reasonable attorneys' fees and interest at the maximum legal rate.
- 16. Respondents and Respondent Spouse agree and understand that if they fail to make any payment as required in the Order, any outstanding balance shall be in default and shall be immediately due and payable without notice or demand. Respondents and Respondent Spouse agree and understand that acceptance of any partial or late payment by the Commission is not a waiver of default by the Commission.

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1	17. Respondents Goman represents that he is the Chief Executive Officer of
2	OWNZONES Media Network, Inc. and has been authorized by Respondent OWNZONES Media
3	Network, Inc. to enter into this Order for and on behalf of it.
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